

**REMARKS**

Claims 1-12 and 14-16 are pending in this application. By this Amendment, claims 1, 14 and 15 are amended and claim 13 is canceled. No new matter is added by these amendments. Reconsideration of the application based on the above amendments and following remarks is respectfully requested.

Applicants appreciate the courtesies shown to Applicants' representative by Examiner Tamai in the June 11, 2009 personal interview. Applicants' separate record of the substance of the interview is incorporated into the following remarks.

The Office Action rejects claims 1-16 under 35 U.S.C. §112, first paragraph, as failing to comply with the written description requirement. Applicants respectfully disagree. As discussed with Examiner Tamai, the specification on page 1, lines 6-8 and lines 9-15, page 7, line 25 to page 8, line 3 and page 9, lines 18-20 sufficiently discloses the lead wire and coils being hardened by the permeation of the varnish. Accordingly, Applicants respectfully request that the rejection be withdrawn.

The Office Action rejects claims 1, 4, 5 and 13-16 under 35 U.S.C. §103(a) over U.S. Patent Application Publication No. 2002/0050752 to Katsuzawa et al. (hereinafter "Katsuzawa") in view of JP-A-2002-078301 to Koiso. Applicants respectfully traverse the rejection.

Claim 1 recites that the lead wire is connected to the internal conductor via a flexible member that is conductive, made of a different material than the lead wire, without providing a structure for preventing varnish treatment and that is higher than the lead wire in flexibility.

The Office Action, on page 3, admits that Katsuzawa fails to disclose a lead wire and a coil that are hardened by the permeation of varnish and a flexible member being higher in flexibility than the lead wire.

Koiso simply discusses a lead wire 1 (alleged flexible member) between the connection 3 and the terminal 6 that is made out of the same material as coil 5 (alleged lead wire) and that has a special structure for preventing varnish infiltration, such as (1) the coolant-resistant resin that fills the boundary 10 between the cover-removed portion 7 and the protection cover 2, (2) an arrangement of the sleeve 12, and others. Thus, Koiso's lead wire 1 has a configuration different from that of the claimed motor module in that the lead wire provides a specific structure for preventing varnish treatment. In other words, according to claim 1 it is possible to obtain the claimed lead wire and the flexible member without providing a specific structure for preventing varnish infiltration, which is contrary to Koiso.

Moreover, as indicated above, Koiso's lead wire 1 (alleged flexible member) is made out of the same material as coil 5 (alleged lead wire), which is contrary to claim 1. Examiner Tamai explained during the personal interview that he could interpret part of Koiso's coil 5 (Fig. 1) as the lead wire because, as illustrated in Figs. 1 and 5 there are two distinct parts of the coil (part 1 being the straight piece (alleged lead wire) in Fig. 1, and part 2 being the coiled piece in Fig. 5 (alleged coil), and the lead wire 1 as the flexible member. The Examiner further explained that Koiso's lead wire 1 and coil 5 were most likely made of different materials. Applicant respectfully disagrees.

Koiso's Fig. 5 illustrates the state of the coil 5 and the lead wire 1 in assembly works and Fig. 1 illustrates the lead wire 1 and coil 5 are unwound from the state illustrated in Fig. 5. Therefore, it would not be a reasonable interpretation to describe Koiso's coil 5 with allegedly two distinct parts (i.e., straight piece and coiled piece). Koiso's Fig. 5 illustrates that the coil 5 is connected to the lead wire 1 at the connection 3, and the lead wire 1 is guided to an outside of the stator while being fixed to the fixing unit 11. In other words, in Koiso's Fig. 5, the coil 5 only has a wound portion located on an inner side with respect to the connecting

portion 3, so it would be unreasonable to consider that there is a straight portion in Fig. 1 of coil 5 that corresponds to a lead wire, as alleged by Examiner Tamai.

Accordingly, Applicants respectfully request that the rejection be withdrawn.

The Office Action rejects claims 2, 3, 6 and 7 under 35 U.S.C. §103(a) over Katsuzawa and Koiso in view of U.S. Patent No. 5,132,584 to Sasamoto et al. (hereinafter "Sasamoto"). Applicants respectfully traverse the rejection.

Sasamoto fails to overcome the deficiencies of Katsuzawa and Koiso as mentioned above, with respect to independent claim 1. Thus, at least in view of the patentably distinct features of independent claim 1, as well as for the additional features recited therein, the rejection of claims 2, 3, 6 and 7 should be withdrawn. Accordingly, Applicants respectfully request that the rejection be withdrawn.

In view of the foregoing, it is respectfully submitted that this application is in condition for allowance. Favorable reconsideration and prompt allowance of the claims are earnestly solicited.

Should the Examiner believe that anything further would be desirable in order to place this application in even better condition for allowance, the Examiner is invited to contact the undersigned at the telephone number set forth below.

Respectfully submitted,



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JAO:RHR/nlp

Attachments:

Petition for Extension of Time  
Request for Continued Examination

Date: August 3, 2009

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